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Attorneys for Defendant
STATE OF ISRAEL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

EITAN O. ELIAHU,

Plaintiff,

vs.

STATE OF ISRAEL,

Defendant.

Case No.: 5:14-CV-01636-BLF

**STIPULATION AND ~~[PROPOSED]~~
ORDER SETTING BRIEFING
SCHEDULE FOR MOTION TO DISMISS
AND CONTINUING CASE
MANAGEMENT CONFERENCE**

STIPULATION

WHEREAS, Defendant State of Israel filed a motion to dismiss the Complaint on September 12, 2014;

WHEREAS, pursuant to Civil Local Rule 7-3, the deadline for Plaintiff Eitan Eliahu's opposition to the motion to dismiss would be September 26, 2014, and the deadline for Defendant State of Israel's reply to the motion to dismiss would be October 3, 2014;

WHEREAS, Plaintiff's counsel's representation of Plaintiff was recently terminated by the Court and Plaintiff is now proceeding *pro se* in the matter;

WHEREAS, the parties believe Defendant State of Israel's motion to dismiss presents complicated issues of law and warrants longer periods of time for briefing;

WHEREAS, Defendant State of Israel reserved for its hearing date January 22, 2015, which was the earliest date available for the Court and for Defendant State of Israel's counsel for a hearing on the motion to dismiss;

WHEREAS, pursuant to this Court's July 23, 2014 Order, the deadline for the parties to complete their Rule 26(f) conference is set for November 20, 2014; the deadline for initial disclosures and submission of the Case Management Statement is December 4, 2014; and the initial Case Management Conference for this case is set for December 11, 2014;

WHEREAS the parties believe that the Court and party resources would be conserved until after the Court has had an opportunity to consider Defendant State of Israel's motion to dismiss and so believe it would be appropriate to further defer the initial Case Management Conference and the deadlines set forth in the July 23, 2014 Order until approximately 60 days after the January 22, 2015 hearing on the motion to dismiss,

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, that (1) Plaintiff Eitan Eliahu will file his opposition brief to the motion to dismiss no later than November 3, 2014; (2) Defendant State of Israel will file its reply brief to the motion to dismiss no later than December 1, 2014; and (3) the initial Case Management Conference is continued to March 26, 2015 at 1:30 p.m., in Courtroom 3, 5th Floor, San Jose Courthouse. The other deadlines set forth in the Court's July 23, 2014 Order are continued accordingly.

1 Dated: September 24, 2014

ARNOLD & PORTER LLP
DANIEL B. ASIMOW
ERICA M. CONNOLLY

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3 By: /s/ Erica M. Connolly
ERICA M. CONNOLLY
Attorney for Defendant
STATE OF ISRAEL

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6
7 Dated: September 24, 2014

EITAN ELIAHU
PROCEEDING *PRO SE*

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9 By: /s/ Eitan Eliahu
EITAN ELIAHU
Proceeding *Pro Se*

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13 **ATTESTATION**

14 Pursuant to Local Rule 5-1, I, Erica M. Connolly, attest that all signatories listed, and on
15 whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

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17 /s/ Erica M. Connolly
ERICA M. CONNOLLY

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20 **IT IS SO ORDERED.**

21 Dated: September 26, 2014

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HONORABLE BETH FREEMAN
U.S. DISTRICT COURT JUDGE